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Attorneys for [PROPOSED] Defendant-Intervenor  
YUHA AVIATAM OF SAN MANUEL NATION,  
a federally recognized Indian tribe, also federally recognized as  
SAN MANUEL BAND OF MISSION INDIANS

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION – RIVERSIDE**

SAVE OUR FOREST ASSOCIATION,  
Plaintiff,  
v.  
UNITED STATES FOREST SERVICE,  
RANDY MOORE, in his official

Case No.: 5:24-cv-01336-JGB-DTB

**YUHA AVIATAM OF SAN  
MANUEL NATION’S NOTICE OF  
MOTION AND MOTION TO  
INTERVENE FOR LIMITED**

1 capacity as Chief of the U.S. Forest  
2 Service,

3 CHRISTOPHER FRENCH, in his  
4 official capacity as Deputy Chief for the  
5 National Forest System of the  
6 U.S. Forest Service,

7 JENNIFER EBERLEIN, in her official  
8 capacity as Regional Forester for the  
9 Pacific Southwest Region of the  
10 U.S. Forest Service,

11 DANELLE HARRISON, in her official  
12 capacity as Forest Supervisor of the San  
13 Bernardino National Forest of the  
14 U.S. Forest Service,

15 MICHAEL NOBLES, in his official  
16 capacity as Front Country District  
17 Ranger of the U.S. Forest Service,

18 Defendants.

19 YUHA AVIATAM OF SAN MANUEL  
20 NATION, a federally recognized Indian  
21 tribe, also federally recognized as  
22 SAN MANUEL BAND OF MISSION  
23 INDIANS

24 [PROPOSED] Defendant-Intervenor.  
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**PURPOSE OF MOTION TO  
DISMISS**

Hearing Date: June 9, 2025

Hearing Time: 9:00 a.m.

Courtroom: 1

Judge: Hon. Jesus G. Bernal

Action Filed: June 25, 2024

1 TO ALL PARTIES AND THEIR ATTORNEYS:

2 PLEASE TAKE NOTICE that on June 9, 2025, at 9:00 a.m. in Courtroom 1,  
3 at the above-entitled Court, located at 3470 Twelfth Street, Riverside, California,  
4 the Yuhaaviatam of San Manuel Nation, a federally recognized Indian tribe (the  
5 “Nation”), will, and hereby does, move this Court for an order granting leave to  
6 intervene in this matter as a Defendant-Intervenor, pursuant to Federal Rules of  
7 Civil Procedure 24(a)(2) or, alternatively, 24(b), for the sole purpose of moving to  
8 dismiss the action based on FRCP 19, on the following grounds:

9 1. The Nation is entitled to intervene as a matter of right pursuant to  
10 FRCP2 4(a)(2) because:

- 11 a. this motion is timely;
- 12 b. the Nation has significant protectable interests relating to the
- 13 properties and/or transactions that are the subject of this action;
- 14 c. the Nation is so situated that the disposition of this action may, as a
- 15 practical matter, impair or impede the Nation’s ability to protect its
- 16 interests; and
- 17 d. the Nation’s interests are not adequately represented by the existing
- 18 parties.

19 2. Alternatively, the Nation should be granted permissive intervention  
20 pursuant to FRCP 24(b)(1)(B) because this motion is timely; the Nation raises  
21 questions of law and fact that are common with those in the main action; and the  
22 Nation’s intervention will not unduly delay or prejudice the rights of the original  
23 parties.

24 This motion is based upon this Notice of Motion; the Memorandum of Points  
25 and Authorities in Support of Motion to Intervene; the Declaration of Eric Ustation;  
26 the Nation’s Request for Judicial Notice and the Exhibits thereto filed in support of  
27 this Motion; the proposed Notice of Motion and Motion to Dismiss, and the  
28 proposed Memorandum of Points and Authorities in Support of Motion to Dismiss

1 which the Nation submits herewith; all the pleadings and records on file; and on  
2 such other and further documentary or oral evidence as may be presented at the  
3 hearing on this motion.

4 Under L.R. 7-3, the Nation's counsel has conferred with counsel for Plaintiff  
5 on 1/6/25 and again on 1/8/25, and with counsel for Defendants on 12/31/24 and  
6 again on 2/26/25. Plaintiff opposes the Nation's motion to intervene. Defendants  
7 do not oppose this intervention motion.

8  
9 Date: March 6, 2025

10 Respectfully submitted,

11 LAW OFFICE OF FRANK LAWRENCE

12 By: /s/

13 Frank R. Lawrence

14 Law Office of Frank Lawrence

15 Counsel for [Proposed] Intervenor

16 Yuhaaviatam of San Manuel  
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